

**BEFORE THE  
NATIONAL LABOR RELATIONS BOARD**

<b>PENNSYLVANIA INTERSCHOLASTIC</b>	)	
<b>ATHLETIC ASSOCIATION, INC. (PIAA),</b>	)	
<b>Employer</b>	)	
	)	
<b>AND</b>	)	<b>Case 6-RC-152861</b>
	)	
<b>OFFICE AND PROFESSIONAL EMPLOYEES</b>	)	
<b>INTERNATIONAL UNION,</b>	)	
<b>Petitioner</b>	)	

**MOTION TO FILE A BRIEF *AMICI CURIAE* IN SUPPORT  
OF PENNSYLVANIA INTERSCHOLASTIC ATHLETIC  
ASSOCIATION, INC. (PIAA)**

The National Federation of State High School Associations (“NFHS”) respectfully requests leave to file a brief *amicus curiae* in support of the Employer in this case, the Pennsylvania Interscholastic Athletic Association (“PIAA”).

The NFHS is the national service and administrative organization of high school athletics. Founded in 1920, the NFHS is composed of one high school athletic or activities association in each of the fifty states and the District of Columbia.

Approximately 90 percent of the high schools in the United States are members of state high school athletic or activities associations that are in turn members of the NFHS. In Pennsylvania, the PIAA is the NFHS member.

The NFHS’s mission is to provide leadership and national coordination for the administration of interscholastic activities, including athletics. Part of that mission is to provide its member associations with proposed playing rules for 15 different high school sports, including lacrosse. Although state associations are not required to use NFHS

playing rules, most do, and in turn states that follow NFHS rules in all material respects participate on NFHS sports rules committees. NFHS playing rules typically emphasize minimizing risk, balance between offense and defense, preserving each sport's traditions, and promoting efficiency in administration.

This case concerns the Regional Director's determination that individuals officiating lacrosse games in Pennsylvania are statutory employees of the PIAA. An important part of the NFHS mission is to provide companion services for coaches, student athletes, and sports officials, including rules books, manuals, exams, rules interpretation meetings, and rules videos. Thus the NFHS has considerable familiarity with how officiating works throughout the country in high school sports, and can offer the Board insight on how high school officiating may be adversely affected by the Board's decision in this case.

The NFHS and its state member associations have a strong interest in the outcome of this proceeding and respectfully request leave to file its amicus brief.

Respectfully submitted,

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### **CERTIFICATE OF SERVICE**

I hereby certify that on April 18, 2016, an electronic copy of the foregoing Brief was served by email at the following email address and was electronically filed with the Regional Director for Region Six:

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